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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	No. 15 CR 319 RS
)	
v.)	SIPULATION AND [PROPOSED] ORDER TO SET
)	CHANGE OF PLEA HEARING
SHAUN W. BRIDGES,)	
)	
Defendant.)	
)	

The United States of America, by government counsel, and the defendant, by and through his counsel, Steven Levin, Esq. hereby notify the Court that the parties have reached a Plea Agreement to the charges contained in the Criminal Information filed June 16, 2015, in the captioned case, to wit:

STIPULATION AND [PROPOSED] ORDER

1 money laundering, with a predicate specified unlawful activity of wire fraud, and obstruction of justice.
 2 The parties hereby stipulate and request that the Court schedule a change of plea hearing for the
 3 defendant to enter his guilty pleas on the afternoon of August 31, 2015, depending on the Court's
 4 availability. Government counsel understands that the Court may be able accommodate a special setting
 5 given the number of parties traveling from the East Coast. In the event the August 31, 2015 date is
 6 unavailable, the parties jointly request September 1, 2015 as an alternative.

7 The government will lodge a copy of the fully executed Plea Agreement with the Court directly
 8 to chambers later today for the Court's review.

9 Further, the parties request the Court order that the arraignment on the Criminal Information that
 10 was filed June 16, 2015, be calendared before the Duty Magistrate on August 31, 2015 at a time just
 11 prior to the time for the change of plea hearing. This date and time is requested given the unavailability
 12 of defense counsel who is coming from out of town, given that the defendant was already arraigned on
 13 the underlying complaint in this matter (for which time has been excluded under the Speedy Trial Act),
 14 and given that the parties have reached a Plea Agreement.

15
 16 SO STIPULATED:

17 Dated: June 17, 2015

_____/s/_____
 KATHRYN HAUN
 WILLIAM FRENTZEN
 Assistant United States Attorneys

RICHARD EVANS
 Trial Attorney, Public Integrity Section

21 Dated: June 17, 2015

_____/s/_____
 STEVEN LEVIN, ESQ.
 Attorney for Defendant

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 27
 28 STIPULATION AND [PROPOSED] ORDER

PROPOSED ORDER

IT IS HEREBY ORDERED that:

- (1) The defendant will be arraigned on the charges in the Criminal Information in the captioned case before the Duty Magistrate on August 31, 2015 [_____] at ___ p.m.;
- (2) The defendant will appear before this District Court on August 31, 2015 [_____] at ___ p.m. for a change of plea hearing; and
- (3) The government shall lodge a copy of the fully executed Plea Agreement with the Court by proving it directly to chambers.

DATED: _____

HONORABLE RICHARD SEEBORG
United States District Judge